

# EXHIBIT C

1                   IN THE UNITED STATES DISTRICT COURT  
2                   FOR THE DISTRICT OF ARIZONA

3  
4   IN RE: BARD IVC FILTERS                   )  
5   PRODUCTS LIABILITY LITIGATION,   )   MD-15-02641-PHX-DGC  
6   \_\_\_\_\_)

7  
8                   DO NOT DISCLOSE - SUBJECT TO FURTHER  
9                   CONFIDENTIALITY REVIEW

10  
11           VIDEOTAPED DEPOSITION OF JACK SULLIVAN,  
12   produced, sworn and examined on behalf of the  
13   Plaintiffs, pursuant to Notice, on Friday, the 16th day  
14   of September, 2016, between the hours of 9:08 a.m. and  
15   6:19 p.m. of that day, at the law offices of Wagstaff &  
16   Cartmell, LLP, 4740 Grand Avenue, Suite 300, in the  
17   City of Kansas City, in the County of Jackson, and the  
18   State of Missouri, before me, NAOLA C. VAUGHN, CCR No.  
19   1052, CRR, RPR, a Certified Court Reporter, within and  
20   for the State of Missouri.

1 EXAMINATION

2 BY MS. KOWALZYK:

3 Q. Mr. Sullivan, we've met before. I'm  
4 Brandee Kawalzyk, counsel for Bard and counsel for  
5 you as well.

6 A. Yes.

7 Q. And I have a few questions in  
8 follow-up to what you were asked today.

9 Just in order to give a little bit  
10 more kind of context of who you are and  
11 everything, could you tell us where you grew up?

12 A. I grew up in Kansas City.

13 Q. Have you lived in Kansas City all your  
14 life?

15 A. Yes.

16 MR. O'CONNOR: Objection. Form.

17 Q. BY MS. KOWALZYK: And do you have  
18 family here?

19 A. I do.

20 Q. Are you married?

21 A. I am.

22 Q. Do you have a lot of family here?

23 A. I have two brothers and a sister. I'm

24 sorry.

25 Q. Do you have kids?

1 A. I do have three kids.

2 Q. Okay. And --

3 A. The reason why I paused on the  
4 brothers is I have a brother that passed away. So  
5 I usually say three brothers and a sister, but I  
6 wanted to be accurate here.

7 MS. KOWALZYK: I'm sorry about that.

8 THE DEPONENT: That's okay.

9 MR. O'CONNOR: I am sorry about that.

10 Q. BY MS. KOWALZYK: How old are your  
11 kids?

12 A. My oldest son is 21, my middle  
13 daughter is 20, and my youngest is 16. And I've  
14 been married for 24 years.

15 Q. And are your oldest two in college?

16 A. Jack is in the Army. He's a sophomore  
17 in the military. Christine is a junior in  
18 college, and Kate is a junior in high school.

19 Q. Would you describe your role as a  
20 regional manager during your time at BPV?

21 MR. O'CONNOR: Object to the form of  
22 the question.

23 A. Sure. So it -- by the time I left, I  
24 was managing one rather large customer, as I  
25 discussed earlier today, but essentially my role